

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

THE UNITED STATES OF AMERICA *et al.*  
*ex rel.* JULIE LONG,

Plaintiffs,

V.

JANSSEN BIOTECH, INC.,

Defendant.

Civil Action No. 16-CV-12182-FDS

**PLAINTIFF'S MOTION TO COMPEL DEFENDANT TO  
PROVIDE COMPLETE ANSWERS TO INTERROGATORIES  
15, 20 & 22 AND TO SUPPLEMENT ITS INITIAL DISCLOSURES**

Pursuant to Federal Rule of Civil Procedure 37(a) and Local Rule 37.1, plaintiff-relator Julie Long respectfully moves for an order requiring defendant Janssen Biotech, Inc., to provide within seven days complete answers to Interrogatories 20 and 22 and Amended Interrogatory 15. Plaintiff further moves for an order requiring Janssen to supplement its initial disclosures in accordance with Federal Rule of Civil Procedure 26(e)(1)(A) within seven days.

For the reasons set forth in the accompanying Memorandum of Law in support of this motion, and the exhibits thereto, Plaintiff requests that this motion be granted.

## REQUEST FOR ORAL ARGUMENT

Plaintiff requests oral argument on this motion.

Dated: April 25, 2022

Respectfully submitted,

/s/ Casey M. Preston

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***Counsel for Plaintiff Relator Julie Long***

**LOCAL RULES 7.1 AND 37.1 CERTIFICATION**

In accordance with Local Rules 7.1(a)(2) and 37.1(a), counsel for plaintiff-relator Julie Long certify that they conferred with counsel for defendant Janssen Biotech, Inc., in a good faith effort to resolve or narrow the issues presented in this motion but were unable to do so.

/s/ Casey M. Preston  
Casey M. Preston (admitted pro hac vice)

**CERTIFICATE OF SERVICE**

I hereby certify on this 25<sup>th</sup> day of April, 2022, that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Casey M. Preston  
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